

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

Case No.: 0:24-cv-60382-DSL

JESSICA PIAFSKY, an individual,

Plaintiff,

v.

MB HOME IMPROVEMENTS INC. a Florida Corporation, MAXIM BOHADANA, an Individual, ROI NEEMAN, an Individual, and CONSTRUCTION FORT LAUDERDALE, INC. d/b/a MB HOME IMPROVEMENTS, a Florida Corporation,

Defendants.

**DECLARATION OF DAVID W.  
BERENTHAL IN SUPPORT OF  
PLAINTIFF'S REQUEST FOR  
THE CLERK ENTER A  
DEFAULT AGAINST  
CONSTRUCTION FORT  
LAUDERDALE, INC.**

I, DAVID W, BERENTHAL, hereby declare under the penalty of perjury the following:

1. I am the attorney at Berenthal & Associates, P.A., the attorneys for plaintiff, Jessica Piafsky, in the above action. I submit this declaration in support to Plaintiff's request to have the Clerk Enter a Default against defendant CONSTRUCTION FORT LAUDERDALE, INC. ("CFLI") pursuant to Rule 55(a) of the Federal Rules of Civil Procedure

2. A copy of the summons and complaint was served on defendant CFLI on March 12, 2024. The return of service of April D. Lewis, Special Process Server, was filed with the Court on March 18, 2024, and is on file in this action as Docket Entry No. 4 and is attached hereto as Exhibit A.

3. Defendant CFLI has not answered or appeared in this action, and the time within which said defendant may appear has expired.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: May 24, 2024

  
DAVID W. BERENTHAL

**REQUEST TO CLERK TO ENTER DEFAULT**

To: Angela E. Nobel, Clerk

Defendant, CONSTRUCTION FORT LAUDERDALE, INC., having failed to answer/appear in this action, and the time for appearance having expired, you are requested to enter defendant CONSTRUCTION FORT LAUDERDALE, INC.'s default pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: May 24, 2024

**BERENTHAL & ASSOCIATES, P.A.**

By: /s/ David W. Berenthal  
David W. Berenthal  
Florida Bar No. 159220  
E-mail: [dwb@berenthalaw.com](mailto:dwb@berenthalaw.com)  
255 Alhambra Circle  
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Coral Gables, FL 33134  
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**CERTIFICATE OF SERVICE**

I hereby certify that on May 24, 2024, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, and that I have mailed the document to the following non-CM/ECF Participants via the United States Postal Service:

MB Home Improvements, Inc.  
6412 N University Drive, Suite 102  
Tamarac, FL 33321

Construction Fort Lauderdale Inc.  
4814 SW 34th Terrace  
Fort Lauderdale, FL 33312

Maxim Bohadana  
9610 NW 24th Street  
Sunrise, FL 33322

Neeman, Roi  
4814 SW 34th Terrace  
Fort Lauderdale, FL 33312

By: /s/ David W. Berenthal  
David W. Berenthal  
Florida Bar No. 159220